

AO 91 (Rev 8/01) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA
V.
Roel Ebenilson Martinez-PortilloUnited States Courts
Southern District of Texas
FILED

CRIMINAL COMPLAINT

February 17, 2022

Case Number:

M-22-0338-M

Nathan Ochsner, Clerk of Court

IAE YOB: 1986
El Salvador
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about February 16, 2022 in Hidalgo County, inthe Southern District of Texas

(Track Statutory Language of Offense)

the defendant being then and there an alien who had previously been deported from the United States to El Salvador in pursuance of law, and thereafter was found near Penitas, Texas, within the Southern District of Texas, the Attorney General of the United States and/or the Secretary of Homeland Security, not theretofore having consented to a reapplication by the defendant for admission into the United States;

in violation of Title 8 United States Code, Section(s) 1326 (Felony)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Roel Ebenilson Martinez-Portillo was encountered by Border Patrol Agents near Penitas, Texas on February 16, 2022. The investigating agent established that the defendant was an undocumented alien and requested record checks. The defendant claims to have illegally entered the United States on February 16, 2022, near Hidalgo, Texas. Record checks revealed the defendant was formally Deported/Excluded from the United States on January 14, 2022, through Alexandria, Louisiana. Prior to Deportation/Exclusion, the defendant was instructed not to return to the United States without permission from the U.S. Attorney General and/or the Secretary of Homeland Security.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Complaint authorized by AUSA Colton Turner

Submitted by reliable electronic means, sworn to and attested
telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

February 17, 2022 7:10 AM

Nadia S. Medrano, U.S. Magistrate Judge
Name and Title of Judicial Officer/s/ Raylin Schannette
Signature of Complainant

Raylin Schannette Border Patrol Agent

Signature of Judicial Officer